

UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF MISSOURI
EASTERN DIVISION

UNITED STATES OF AMERICA,)
)
Plaintiff,)
)
v.) No. S1 4:23CR00274 JMD/JSD
)
MACE NOSOVITCH,)
)
Defendant.)

**UNITED STATES' MOTION FOR EXTENSION OF TIME TO
RESPOND TO DEFENDANT'S POST-HEARING MEMORANDUM
IN SUPPORT OF MOTION TO SUPPRESS EVIDENCE (JAIL CALLS, ETC.)**

COMES NOW the United States of America, by and through Thomas C. Albus, United States Attorney for the Eastern District of Missouri, and Catherine M. Hoag, Assistant United States Attorney for said District, and for its Motion for Extension of Time to Respond to Defendant's Post-Hearing Memorandum in Support of Motion to Suppress Evidence (Jail Call, Etc.), states as follows:

1. On March 25, 2024, the defendant filed several pretrial motions, including a Motion to Dismiss Count One (R. Doc. #59), a Motion to Suppress Statements (R. Doc. #61), a Motion to Suppress Evidence (Residence) (R. Doc. #63), a Motion to Suppress Evidence (Autos) (R. Doc. #65), and a Motion to Suppress Evidence (Jail Calls, Jail Texts, Etc.) (R. Doc. #67). The Government filed its responses to said motions, filing its last response on August 27, 2024 (R. Doc. #102).

2. Proceedings on the matter were stayed for a competency evaluation in October 2024. The matter was set for hearing on the defendant's motions in May 2025. (R. Doc. #140). The hearing was continued to June 10, 2025 at the request of defense counsel. (R. Docs. #141-142).

Oral arguments were heard on the defendant's motion to suppress evidence (jail calls, etc.) on June 10, 2025. (R. Doc. #152). The Court ordered the defendant to file his post-hearing memorandum by July 10, 2025, and for the Government to file its response by August 11, 2025. (R. Doc. #153).

3. The defendant filed his post-hearing memorandum in support of motion to suppress evidence (jail calls, etc.) on July 11, 2025. (R. Doc. #154).

4. The United States requests an extension up to and including September 2, 2025, to file its response to the defendant's post-hearing memorandum. The extension is needed for various reasons, including the complex procedural issues raised by the defendant in his post-hearing memorandum, as well as the press of business, including preparations for contested sentencing, pretrial motion responses, and existing deadlines in other cases, and a personal loss of the undersigned.

4. Defense counsel has been informed of this request for an extension of time.

WHEREFORE, the United States request up to and including September 2, 2025, to file its response to the defendant's post-hearing memorandum in support of motion to suppress evidence (jail calls, etc.).

Respectfully submitted,

THOMAS C. ALBUS
United States Attorney

/s/ Catherine M. Hoag
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CERTIFICATE OF SERVICE

I hereby certify that on August 8, 2025, the foregoing was filed electronically with the Clerk of the Court to be served by operation of the Court's electronic filing system upon all counsel of record.

/s/ Catherine M. Hoag
CATHERINE M. HOAG #67500MO
Assistant United States Attorney